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Executive Director-Federal Relations

September 22A, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 03-194 – Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Arizona

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to report on the various initiatives underway to improve Qwest's performance for Unbundled DS1 Loops under Performance Indicator Definitions ("PIDs") OP-5 and MR-8.

As a result of customer feedback, Qwest initiated a "DS1 Failure Frequency Reduction" project in October, 2002. Under this project, Qwest analyzed its provisioning and repair activities for Unbundled DS1 Loops and identified areas for improvement. The identified areas resulted in the implementation of several activities, including provisioning and repair training for technicians, process gap analysis, and coaching for process adherence anomalies. Examples of action items resulting from these activities included reinforcement of cross-office testing processes, a new and improved provisioning job aid for technicians, and an internal report to track performance at the field supervisor level.

In an effort to harness the momentum from these activities and produce still further improvements, a Vice President-level Executive Steering Committee was formed in December, 2002. The Executive Steering Committee has met weekly since that time, focusing principally on improvements at the local level.

Qwest's initial effort to improve Unbundled DS1 Loop reliability did not uncover any systemic reasons for disparity between Wholesale and Retail, principally because Qwest's DS1 provisioning and repair processes are identical for CLECs and Qwest Retail customers. Nevertheless, to improve performance at all levels, the Executive Steering Committee opted to take a global approach, and developed a Corporate Plan in April, 2003, with over a dozen additional initiatives.

A root cause analysis performed by Qwest to better isolate the cause of Unbundled DS1 Loop trouble reports identified Qwest's outside plant facilities as the source for roughly 40-50% of all DS1 trouble reports in the Qwest states. The Corporate Plan therefore proposed identifying the top ten wire centers and facility routes that contribute to DS1 trouble rates and investigating specifically those centers and facilities. [1] Using this information, Qwest focused its efforts on outside plant refurbishment, or rehabilitation, to address facility-related troubles. Qwest also began reviewing the underlying technology, or facility, upon which DS1 loops are provisioned to identify manufacturer-discontinued network elements that could be upgraded to improve network reliability as well as reduce the potential number of failure points in the network.

Arizona-specific activities intended to improve Unbundled DS1 Loop reliability include 56 rehabilitation projects; upgrades of HDSL [2] to HDSL2/4 in the Phoenix North East wire center; rewiring HDSL-related equipment shelves in the Phoenix North wire center; and bonding/grounding engineering work packages intended to mitigate electromagnetic force (EMF) interference caused by power lines.

The goal of the Executive Steering Committee is to ensure that Qwest's Unbundled DS1 Loop performance continues to be adequately monitored, addressed, and improved going forward.

The 20-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

Hance Haney

Hance Haney

cc: A. Goldberger
G. Remondino
J. Myles
R. Harsch
M. Scott

[1] This top ten list is dynamic and subject to change based on various factors, including, but not limited to, changes in climate, improvements in training, technology upgrades, and Qwest's ongoing analysis of the needs of its wire centers and facility routes.

[2] HDSL is the acronym for "High-bit-rate Digital Subscriber Line."